



EPA Region 5 Records Ctr.



317098

September 10, 2008
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
Monthly Report; August 1 – August 31, 2008 Reporting Period**

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from August 1 to August 31, 2008.

Sincerely,

Steven D. Smith
Project Coordinator

cc: Leah Evison – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski- Monsanto
Linda Tape - Husch Blackwell Sanders LLP

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Status Report

Date of Report: September 10, 2008
Period Covered: August 1, 2008 – August 31, 2008

Work Performed During the Reporting Period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remains under review. Portions of the Plan applicable to the placement of sediments have been approved.*
- Performed inspections of the site.
- Maintained stormwater and leachate collection controls around the containment cell.
- Monitored support area facilities.
- Analyzing second quarter 2008 groundwater samples from the monitoring wells around the containment cell.

Dead Creek

As of the end of July, construction of the liner in Sector B of Dead Creek was still shut down and will remain so until the groundwater level in the vicinity of the site recedes sufficiently to allow construction equipment to operate in the bottom of the creek without the need for extensive dewatering activities. The alternative of pumping significant quantities of water downstream of Creek Sector B in order to drain the construction site is not feasible since all of the Dead Creek segments, up to and including the Borrow Pit Lake, remain at, or very close to, maximum storage capacity. To date, approximately 98 percent of the fill placement along the banks of the creek has been completed and geosynthetics have been deployed and welded from Queeny Avenue to within 300 feet of

Judith Lane. In addition, the flexible concrete matting for erosion protection on the steeper banks of the creek has been installed on the northern end of the site, and the crushed stone bedding and rip rap layers have been constructed over all of the geosynthetic materials.

Because of the uncertainty about when construction will resume, the water treatment plant that was brought on site to treat the groundwater impounded at the end of Creek Sector B was decommissioned and removed from site. When construction resumes, it is expected that the groundwater inflow will be small enough that the on site treatment facility will be able to treat the flow. Water levels in the creek continue to be monitored.

During a May 24, 2007 teleconference, EPA requested that submittal of a Technical Memorandum summarizing the results of the additional excavation in Dead Creek be delayed until the results of an investigation into the potential for cadmium to leach from soils in Dead Creek into groundwater can be incorporated. A report presenting the results of that investigation was submitted on October 25th, 2007. Comments were received from the Agency on November 27th, 2007 and the revised report incorporating those comments was submitted to the Agency on January 3, 2008 and was approved on January 24th, 2008. During a meeting on October 11th, 2007, the Agency further requested that a comprehensive construction completion report be prepared summarizing all of the removal work carried out in Dead Creek. That report will include, sediment removal performed in 2001 and 2002, details of the containment cell construction, information on the additional excavations performed in 2005 and 2006, and the results of the investigation into the potential for cadmium to leach into groundwater. That report is being prepared, but will not be finalized until construction of the liner in Creek Sector B is complete and the as-built configuration is available..However, at a meeting held on August 19th, the Agency requested that a report be prepared summarizing the post excavation constituent concentrations in the surficial soils along the entire creek. That report will be submitted by the end of September.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Perform necessary operation and maintenance activities on the containment cell and temporary treatment system.
- Continue to fund the Village of Cahokia's operation of the creek dewatering system.
- Complete the analyses of the second quarter 2008 groundwater samples from the wells around the containment cell.
- Collect third quarter 2008 groundwater samples from these wells.
- Continue work on the installation of the liner in CS-B if water levels permit. .

- Prepare the report summarizing the post excavation constituent concentrations in the surficial soils along the creek.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %